STATE OF GEORGIA
TMDL IMPLEMENTATION PLAN
FOR JONES CREEK, COLUMBIA COUNTY, GEORGIA

Background

Jones Creek in Columbia County, Georgia has a beneficial water use classification of fishing and is currently listed as an impaired water body. The degree of impairment is classified as a partially supporting use and the TMDL for Jones Creek is set at a target level of 150 cfu/100 ml of water, a level that will allow the water body to achieve water quality standards necessary for the beneficial use classification of fishing.

A Total Maximum Daily Load (TMDL) is a calculation of the maximum amount of a pollutant, from both point and non-point sources, that a waterbody can receive and still meet water quality standards. The Clean Water Act, section 303, establishes the water quality standards and the TMDL programs. TMDLs are simply the implementation of rules included in Section 303(d) of the Clean Water Act of 1972. The resulting inventory of impaired streams and water bodies – called the 303(d) list – provides a basis for decisions related to restoring water quality. Although some TMDLs are aimed at managing all sources of pollution which affect beneficial uses of water, the focus of the implementation plan discussed here relates primarily to nonpoint water sources including contamination from diffuse sources such as agricultural and urban runoff.

Methods of measuring pathogens directly are costly and time-consuming. In most cases, indicator organisms are used instead of analyzing the pathogens themselves. These indicator organisms are bacteria that also occur in human and animal waste, but generally are not pathogens themselves. In contrast to pathogens, the coliforms are easy to collect and count, and often provide at least an indication of whether or not fecal matter has entered the water body. The downside of using indicator organisms like coliforms is that coliform tests are generally nonspecific; they do not distinguish between human and other animal coliform. However, at present, this is our best source of indication. Loads are expressed in terms of cells per 100 ml of water.

The purpose of this plan is to reduce or eliminate the pollutants contained in the runoff into Jones Creek. See the attached Jones Creek Study Area map which outlines the Jones Creek drainage basin.

Existing TMDL and Monitoring Data

Four sources of data are currently available to determine the existing levels of fecal coliform present in Jones Creek. The sources include the TMDL, sewage spill data from 1992, monitoring data from 1999 and 2000, and a single day of monitoring data in 2001.

The first source of data is the TMDL document. The levels indicated in the TMDL document are based on a model run for 1987 and 1988 critical time periods using the "calibrated" fecal and flow parameters. The representative critical summer time period used was May through October 1987 and the representative critical winter time period was November 1987 through April 1988. This model run resulted in a summer fecal coliform 30 day geometric mean of 1302 cfu/100 ml. This is 1152cfu/100 ml above the target level of 150 cfu/100 ml.

The second source of available data was obtained immediately following a sewage spill into Jones Creek on October 12, 1992. Levels as high as 5700cfu/100ml were recorded the day following the spill. Data obtained six (6) days following the spill indicate that levels had dropped below the target levels to an acceptable level of 100cfu/100ml. A third source of data available

for review was obtained over a period of one year (March 1999 – March 2000) and a geometric monthly mean was determined for each month of the sampling period. During this time, only the month of July, 1999 resulted in levels of fecal coliform above the target level of 150cfu/100ml. Data from July, 1999 indicates a level of 528cfu/100ml. Finally, a single day of sampling performed on February 15, 2001 did not indicate that fecal coliform levels above the target level were present. The four sources of data are attached in Appendix A.

More data are needed to identify sources of nonpoint source pollution within the watershed. Local expertise and involvement from environmental agencies, federal agencies, schools and universities, and other sources will play critical roles in identifying sources and reducing fecal coliform levels in Jones Creek.

Land Use

The Jones Creek drainage basin is approximately 4.45 square miles (2,848 acres) of mixed land use development. While its residential land use is fairly high, there are some areas of rural development, along with an industrial park and railroad line within the limits of the watershed. Part of the rural development does include a horse farm along Evans-to-Locks Road. Portions of the residential areas in the drainage basin rely on septic tanks.

Possible causes of increased levels of fecal coliform in Jones Creek include: human waste from sewage leaks or septic tank leaks, domestic animals, urban wildlife, livestock, or rural wildlife. Monitoring and analysis of data collected as a part of the implementation plan will be necessary to determine the actual source of the fecal coliform bacteria.

Existing Regulatory or Voluntary Actions

The Columbia County Water Works Department is active in preventing and reacting to spills and leaks that may occur in the sanitary sewer lines throughout the county. Spills sometimes result from clogged sewer lines or vandalism that has occurred to the system. The County currently monitors illicit connections to the system and responds immediately to any problems within the system that may result in a spill or leak of sewage. If a spill does occur, drainage ponds in the area of the spill are aerated to ensure the decomposition of harmful bacteria that may be present in the water.

Columbia County has maintained a strict Land Development Review process since April, 1994. This process ensures compliance with land use, engineering, and environmental regulations throughout the County. Columbia County has also applied for a Municipal Separate Storm Sewer System (MS4) Permit which establishes legal authority for Columbia County to detect and eliminate all illicit connections to the storm sewer system. The permit also has requirements to develop and enforce a stormwater management program that encompasses water quality monitoring, engineering controls, comprehensive land planning, and public participation. This permit has been applied for and approval is expected in Spring of 2001.

Another tool in place in Columbia County is the Soil Erosion and Sedimentation Control Ordinance. This ordinance protects streams in Columbia County by establishing a 25-foot protective buffer along each side of the streams. The ordinance takes the same steps to protect streams as the River Corridor Protection Ordinance takes to protect rivers in Columbia County. By limiting septic tank usage within these stream buffers, the possibility of leakage is reduced; thus the potential for loading of fecal coliform bacteria from leaking septic tanks is lessened.

Columbia County has recently completed a Greenspace Plan, a result of the passage of Senate Bill 399, which officially created the Georgia Greenspace Program. The Greenspace plan

includes an inventory of greenspace, identifies desirable parcels of land and water for protection, and requires appropriate changes to the county's comprehensive plan. Ultimately, a minimum of twenty (20) percent of natural greenspace, including lands adjacent to Jones Creek, in Columbia County will be preserved. The Greenspace Plan is complete and is awaiting approval from the Georgia Department of Natural Resources. The plan should be approved during Spring, 2001.

Georgia is in the process of implementing a watershed approach to water resource management through River Basin Management Planning. River basin planning is the foundation for implementation of water protection strategies in Georgia. This approach provides the framework and schedule for actions to address the waters on the Georgia 303(d) list. The basin planning program is based on legislation in 1992 (O.C.G.A. 12-5-520) by the Georgia Assembly which calls for EPD to develop river basin management plans for each of the major river basins in Georgia. The Savannah River Basin Management Plan should be adopted in April, 2001.

Three environmental protection ordinances are scheduled for implementation in Columbia County by February of 2002. These ordinances include Water Supply/ Watershed Protection, River Corridor Protection Ordinance, and Wetlands Protection Ordinance. The Water Supply/ Watershed ordinance will limit types and density of development that would impair the water supply or watershed. This ordinance will allow for the establishment of protective buffers around streams where septic tanks are not allowed to be placed. This ordinance will also limit impervious surface adjacent to streams.

The River Corridor Protection Ordinance protects land within 100 feet horizontally on both sides of the Savannah River. Since the impaired Jones Creek flows directly into the Savannah River, it is directly affected by this ordinance. New construction is prohibited in the river corridor except for single family houses on two-acre or larger lots. Septic tanks and septic tank drainfields are prohibited in the river corridor, as are hazardous waste and solid waste landfills. These provisions help to keep pollution flowing into the river at a minimum. Potential for fecal coliform bacteria caused by leaking septic tanks is decreased by this ordinance.

The Wetlands Protection Ordinance protects wetlands in Columbia County from alterations that will significantly affect or reduce their primary functions for water quality control, floodplain and erosion control, groundwater recharge, aesthetic nature, and wildlife habitat. This protection is achieved through land use controls on lands surrounding wetlands. The floodplain control measures contained in the ordinance also serve to indirectly control fecal coliform bacteria levels because of the direct correlation between fecal coliform bacteria levels and flow rates. Less unnatural flooding and water diversion means lower flow rates, and therefore, lower fecal coliform levels.

The Georgia Adopt-A-Stream program maintains four underlying principles: to increase public awareness of the state's nonpoint source pollution and water quality issues, to provide citizens with the tools and training to evaluate and protect their local waterways, to encourage partnerships between citizens and their local government, and to collect quality baseline water quality data. The Georgia Adopt-A-Stream has been a successful program in Columbia County. A partnership between Grovetown Elementary School, Harlem Middle School, Greenbrier High School, and Baker Road Landfill in Columbia County has proven to be very successful in maintaining quality monitoring of Euchee Creek in Columbia County. The program is not currently active in the Jones Creek drainage basin; however, the coordinator for Columbia County, Ginny Brady, is making plans to incorporate Jones Creek into the Adopt-A-Stream program in Columbia County.

The Sierra Club, with over 600,000 members, has an active chapter in the Jones Creek area. The mission of the Sierra Club is as follows: explore, enjoy, and protect the wild places of the earth; practice and promote the responsible use of the earth's ecosystems and resources; educate and enlist humanity to protect and restore the quality of the natural and human environment; and use all lawful means to carry out these objectives. The presence of a group with strong dedication to the protection of the environment is positive for the area. The Sierra Club should take an active role in helping in the implementation of the strategies identified in this plan.

Recommended Regulatory or Voluntary Actions

Implementation of measures to address the TMDL involves the cooperation of all landowners and land users in the watershed; therefore, broad awareness and involvement are very important to the success of the implementation plan. Through careful land use planning and the use of best management practices, impacts of stormwater runoff can be minimized. Stormwater runoff can be improved through methods like erosion control and the establishment of green spaces, park lands, and stream buffers.

The Columbia County Board of Education should also get involved in the process of reducing fecal coliform bacteria by including educational programs in the curriculums of local schools. The River Kids program or a program called Enviroscape could be effective if implemented in Columbia County schools. Through these programs, children take water samples and learn how to keep water bodies clean as a part of their regular schoolwork. Introducing water quality issues to children at a young age, and following up with the program through middle school and high school can lead to long-term action and dedication on the part of the citizens of Columbia County. One student in the area has already taken a great interest in the fecal coliform levels in Jones Creek. George Doss, eighth-grader at Davidson Fine Arts Magnet School, has performed a study called *How Does Stormwater Runoff Affect the Fecal Coliform Count in Jones Creek?*. George could provide assistance as school groups begin to explore Jones Creek. The report is attached in Appendix B.

The expansion of the Adopt-a-Stream program to include the monitoring of Jones Creek could be accomplished through a partnership of the local chapter of the Sierra Club and the already active school system in Columbia County. The formation of this partnership would depend on local interest in water quality and other environmental issues. The local Sierra Club chapter should promote the Adopt-a-Stream program in Columbia County. The local chapter of the club should serve to educate other citizens and officials of Columbia County and arouse further interest in clean water. For effective TMDL compliance, all landowners and land users in the drainage basin must be educated about water quality and the steps necessary to minimize the impacts of stormwater runoff.

Columbia County should conduct a septic tank survey to identify those locations with septic tanks in use. Once the locations of the septic tanks are determined, a “Septic to Sewer” incentive program should be implemented to encourage conversion from the use of a septic tank to the use of Columbia County’s sewer system. An educational program teaching citizens about the importance of septic tank repair and maintenance could help reduce leaks from septic tanks.

The development of a system to treat stormwater runoff before it enters Jones Creek should be explored. As a part of the Municipal Separate Storm Sewer System (MS4) Permit, Columbia County is likely to explore the possibility of treating storm water before it enters Jones Creek. This treatment may be in the form of physical structures like ponds or devices installed in the

storm water traps to facilitate the fallout of pollution before it enters Jones Creek. The use of any chemicals that may be harmful to wildlife in the area should be avoided.

The Columbia County Water Works Department plans to develop additional proactive measures to ensure that leaks and spills from the sanitary sewer system are prevented. The Water Works Department has a camera system that is used to explore the sewer system to detect any areas the need to be repaired or replaced. Often, roots intrude into the sewer line and this can lead to clogging of the sewer line. The Water Works Department plans to rely on outside contractors to correct the root intrusion problem by treating roots with a foaming agent to physically rot the root in the sewer system. Global Positioning Systems (GPS) will be used to identify the location of the main trunk lines adjacent to the creeks in Columbia County. This will provide a tool for identifying the location of potential problems with the trunk lines as they occur.

Schedule for Implementing Management Measures

In order to establish an effective TMDL implementation plan, an implementation schedule must be carefully adhered to. A stakeholder group for the Jones Creek drainage basin has been established and this group has been instrumental in the identification of potential sources of fecal coliform in the Jones Creek area and in the development of potential measures to reduce or eliminate the excessive levels of fecal coliform present in the creek. A stakeholder group of land owners, business owners, government officials, elected officials, and environmental activists has been formed to help identify the problem and to help implement identified solutions. The list of Stakeholders is attached in Appendix C.

During the first year, this group of stakeholders must actively work together to continue to identify remedial measures and potential funding sources necessary to implement these remedial measures. Initial management controls and best management practices must be established and initial implementation must begin in the first year. Educational programs in the schools and throughout the community must be implemented as soon as possible during the first year of the plan. Monitoring and status reports of any improvement or worsening of the fecal coliform levels must be implemented within the first year. Any illicit discharges must be detected and eliminated as soon as possible.

By the second year of the implementation plan, data from the summer season and winter season will be available and preliminary sources of the fecal coliform should be identified and analyzed. Management programs, best management practices, monitoring and evaluation of data, and periodic status reports must continue throughout the five-year implementation plan. If the fecal coliform levels remain above the targeted level of 150cfu/100ml during the fifth year of the plan, the process to develop a more stringent Phase II plan should begin during year five. The projected attainment date is ten years from the acceptance of this implementation plan by EPA.

Monitoring Plan

Water quality monitoring is a critical component in determining the success of the implementation plan. Monitoring helps determine compliance with regulations, major sources of loadings, and the effect of the regulatory and voluntary measures implemented in the drainage basin. No two watersheds are alike. Therefore, the monitoring of the particular watershed, rather than relying on computer model data, is critical to determine the fecal coliform levels actually present in the impaired water body.

Levels of fecal coliform in Jones Creek will be monitored by standard periodic grab sampling to calculate an instream 30 day geometric mean fecal coliform. Sampling should be scheduled, at a minimum, biannually. Samples should be obtained during the summer season (May through

October) and during the winter season (November through April) to provide a complete inventory of the conditions in the Jones Creek basin. In addition, sampling should represent periods of dry weather and post-rainfall monitoring. Levels of fecal coliform have been recorded at higher levels directly after rainfall, so this monitoring is key in identification of sources of fecal coliform bacteria. If a source of the fecal coliform bacteria has not been determined after periodic monitoring, the smaller tributaries to Jones Creek should be monitored to help identify the source.

Funding

There are currently several funding sources available for the county to engage in a stable monitoring schedule. Grant funding from Section 319(h) of the Clean Water Act, Nonpoint Source Implementation Grants, may be used for the installation of best management practices (BMPs) for animal waste and landowner education programs. Capitalization Grants for Clean Water State Revolving Funds is a potential source of funding used to aid in urban runoff control, stormwater overflows, riparian buffers, and other water protection activities. Watershed Assistance Grants are also available through the EPA to aid in the development of partnerships to address water quality issues. Other matching grants may be available through the Environmental Protection Agency's Office of Water for both non-point source mitigation and water quality testing.

There has been some discussion about the possibility of the Department of Natural Resources, Environmental Protection Division contributing to the cost of monitoring these impaired water bodies. Further research into possible funding sources should be continually conducted over the five-year implementation period. Contact information for the funding mentioned above is listed in Appendix D.

Criteria to Determine Progress

Progress on the implementation plan will be determined through analysis of water quality sampling results. Periodic monitoring will show the trends of fecal coliform levels throughout the five-year period. The number of regulatory controls or best management practices implemented in the Jones Creek drainage basin will also serve as a measure of progress. The implementation plan will be ultimately deemed successful if, at the end of the five-year implementation period, the fecal coliform levels in Jones Creek are below the 150 cfu/100 ml recommended in the TMDL document and the stream is removed from the 303(d) list.

Conclusion

The establishment of an effective TMDL implementation plan is essential to the environmental and economic health of Columbia County. In order for Columbia County to continue to grow, any drainage basin that has been determined to have excessive levels of fecal coliform must establish a TMDL implementation plan and make a good faith effort to meet the requirements set forth in the plan. As stated in the Clean Water Act, if the implementation plan is not efficiently executed, Columbia County could face difficulties in such development as expansion of wastewater treatment facilities and certain industries that could contribute to increased levels of fecal coliform.

The implementation of regulatory and voluntary management measures, coupled with the regular monitoring of Jones Creek, should reduce the levels of fecal coliform bacteria present in the water body. The plan has a five-year horizon for the restoration of acceptable levels of bacteria. If the fecal coliform levels in Jones Creek are not at an acceptable level by the end of the fourth year of the plan, a second phase of the implementation plan will be developed.

Jones Creek Stakeholder List

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Land Owner
AB Beverage
665 Industrial Park Drive
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Land Owner
Club Car Facility
637 Industrial Park Drive
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Land Owner
Krystal River Water Park
799 Industrial Park Drive
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Land Owner
Blue Circle
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Land Owner
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